



September 7, 2011

Mr. Liang C. Chiang, P.E.
Department of Toxic Substances Control
Southern California Permitting Branch
1011 N. Grandview Avenue
Glendale, CA 91201

Re: Rho Chem, LLC; CAD008364432, Class 2 (RCRA) Permit Modification Request

Dear Mr. Chiang:

On behalf of Rho Chem, LLC, I would like to submit a Class 2 Permit Modification request to the Department of Toxic Substance Control (DTSC). As you may recall, we discussed this issue in our meeting of 03/10/2011. In subsequent discussions thereafter, it was determined that a Class 2 Permit Modification would be required for these changes to take place.

This request entails two (2) changes we would like to make to the facility.

1. The first request is to add Tote Containers (i.e. 500 gallon capacity or less) to the types of containers stored in Unit A as defined in the RCRA Part B Permit Unit Summary. This change does not involve any change to the storage capacity of the unit as defined in the Unit Summary Table. The Waste Code listing for Unit A will not be affected by this change, as this is simply a container type modification for consolidation purposes. This type of container was not identified in the permit previously.
2. The second request involves adding the capability to store propane cylinders (5 gallon capacity and less) either on pallets, drums or cylinder racks, within Unit J as defined in the RCRA Part B Permit Unit summary. This request does not involve any change to the storage capacity of the unit as defined in the Unit Summary Table. The Waste Codes listing for Unit J will not change as this area was already capable of receiving D001 materials under the existing permit. This type of container was not identified in the permit previously.

This change requires a Class 2 Permit Modification as identified in Chapter 20, Appendix I-1, Classification of Permit Modifications, I-1.F Modifications, 6. Other changes in container management practices (e.g., aisle space; types of containers; segregation).



Specifically in Part IV. Permitted Units and Activities (page 8 of 32)

1. Unit Name: Area A, Drum Yard

Activity Description:

(b) Waste consolidation/size reduction in Area A-2: Compatible hazardous wastes are repackaged into other 55-gallon or smaller containers.

We request that this language be changed to read:

(b) Waste consolidation/size reduction in Area A-2: Compatible hazardous wastes are repackaged into 500 gallon totes, other 55-gallon containers, or smaller containers.

No other changes to the language of this permit section would be required.

Part IV. Permitted Units and Activities (page 20 of 32)

8. Unit Name: Area J, Container Storage

Activity Description: This Unit is for storage of hazardous waste in various sizes of containers (pails, drums, totes and cubic-yard boxes).

We request that this language be changed to read:

Activity Description: This Unit is for storage of hazardous waste in various sizes of containers (pails, drums, totes, propane cylinders and cubic-yard boxes). Propane cylinders will be 5 gallons or less and either palletized, placed within 55-gallon drums (i.e. smaller Coleman Stove type cylinders or equivalent) or in propane cylinder racks.

Waste Type: Ignitable solids, aerosol cans, lab-packs and loose pack paint and paint related material, toxic wastes, and stabilization material (RCRA solids).

We request that this language be changed to read:

Ignitable solids, aerosol cans, compressed gas cylinders (propane), lab-packs and loose pack paint and paint related material, toxic wastes, and stabilization material (RCRA solids).

We have reviewed all other portions of the RCRA Part B Permit and the Permit Application and determined that no other changes to the language of this permit section would be required. Nothing in this submittal will impact the Closure Plan, Financial Assurance, Training Plan, Waste Analysis Plan, Contingency Plan, Process Information, Operating Plan or any other portion of the permit other than the Unit Summary. This submittal merely reflects additional types of containers (i.e. totes in Area A and Compressed Gas Propane Cylinders in Area J) that were not previously identified in the permit renewal submittal for the Unit Summary.



If you have any questions or need additional information or clarification, please contact Craig Erickson at 323-776-6233; cerickson@pscnow.com, or Jim Renfro at 713-515-6652; jrenfro@pscnow.com.

Sincerely,

//Original signed by//

Ramon Robles
General Manager

Cc:	Gary Crueger	RVP, Seattle, WA
	Lisa Tuck	EHS Director, Houston, TX
	Jim Renfro	Regional EHS Director, Houston, TX
	Craig Erickson	EHS Manager, Inglewood, CA

Attachments:
Part A Application
Site Plan